

1 A When he went into the hospital.

2 Q And what was said during that discussion?

3 A Mike went into the hospital and this is why. I
4 can't remember exactly what it was, but that he had been
5 charged on this and that and the other thing.

6 And I said "Oh."

7 Q And your reaction beyond "Oh"?

8 A How does this affect the station and my employees?

9 Q Well, did she tell you how it should affect?

10 A She said it won't affect the station and
11 employees, and then the station is not for sale, because
12 that's the first concerns is my staff, you know. The first
13 thing they are going to want to know is how does this affect
14 me. You know, that's what we always want to know, how does
15 it affect me.

16 And the answer was it does not affect the station,
17 and the station is not for sale, and we will just continue -
18 - we will take care of -- these folks over here, take care
19 of these matters.

20 Q Was anybody else present during this discussion?

21 A No.

22 Q Any other discussion between you and Janet Cox
23 about Michael Rice's arrest?

24 A I think just to update me on the situation and how
25 it's going in the hospital or whatever, and that's about it.

1 You know, it wasn't really my concern.

2 Q Did you ever discuss Michael Rice's insulation as
3 a result of these charges?

4 A I guess about the same thing I just answered I
5 guess. Once in awhile an update on if he was still in the
6 hospital.

7 Q Did you ever participate in a discussion in which
8 managers were instructed not to take orders from Michael
9 Rice?

10 A No. That never was an issue, so I never -- at
11 least with me. I don't -- I can't speak for anybody else.

12 Q What are the extent of the communications you had
13 with Michael Rice?

14 A Getting a building painted; fixing a light on the
15 outside of the building; plumbing; the equipment, he was
16 very much into and interested in equipment, and getting us
17 good equipment at the radio station, working on equipment.

18 Q So procuring equipment is one of the conversations
19 you had with Michael Rice?

20 A Working on equipment. I didn't have a say on
21 whether we bought or not bought something. It just showed
22 up and we put it in.

23 Q You mentioned that you ran your station, and he
24 now is bringing equipment in or repairing equipment, and you
25 said that you had no say in this?

1 A Oh, we might have talked on why we needed this
2 particular piece of equipment. You know, when you get
3 equipment at a radio station it's kind of like Christmas,
4 you know. Everybody is really fired up about it. So people
5 aren't going to question it.

6 Q In your testimony on page 2, Exhibit 3,
7 paragraph --

8 JUDGE STEINBERG: Okay, the witness doesn't have a
9 copy of it. Maybe somebody wants to -- do you have an extra
10 copy you can place in front of the witness? It would be
11 helpful if he knew what he said.

12 THE WITNESS: Page 2? Yes, sir.

13 BY MR. MASTANDO:

14 Q Page 2 of Exhibit 3, your testimony, paragraph
15 five. It said that you had conversations primarily related
16 to his concerns as a landlord of the physical plant, and not
17 to the programming, sales or other aspects of the station's
18 manager and policy or daily operations; is that correct?

19 A Yes, it is.

20 Q You say in your testimony that they were primarily
21 related to those concerns.

22 What other things outside of what you enumerated
23 did you discuss?

24 A Mowing the grass, trimming the trees.

25 Q That would be primarily related, but what about

1 the secondary things, the tertiary things?

2 A The weather.

3 Q So nothing then -- anything outside of dealing
4 with the station?

5 A I'm sorry. Your question?

6 Q I withdraw the question.

7 A Okay.

8 Q Were there any format changes at KBMX during your
9 tenure there?

10 A Oh, I wouldn't call it a format change. We always
11 were trying to fine tune the music. Come on now. Fine tune
12 it, we can say that. We didn't change it. We kept it easy
13 listening music, and added a little more easy vocals, soft
14 vocal.

15 Q And did Michael Rice participate in any of those
16 discussions --

17 A No.

18 Q -- decisions or otherwise?

19 A No.

20 Q You mentioned something about construction
21 projects that were going on.

22 A Um-hmm.

23 Q What were those construction projects?

24 A Oh, the painting of the building. At one time
25 Casey Van Allen mentioned to me that they were going to

1 build a -- oh, a building that we could house some more past
2 records and that kind of stuff, but it never really
3 transpired.

4 JUDGE STEINBERG: Is that a storage building?

5 THE WITNESS: A storage building. It never
6 happened, so we kind of nixed the idea.

7 Dennis Klautzer, I'm sorry. I am using his radio
8 name.

9 JUDGE STEINBERG: Well, as long as the record
10 reflects --

11 THE WITNESS: Okay.

12 JUDGE STEINBERG: -- who you are referring to, you
13 can use whichever name you want.

14 BY MR. MASTANDO:

15 Q Did Michael Rice ever give you projects to work on
16 or task you with assignments?

17 A To like get quotes on the building to be painted,
18 or I think we had talked about a sign, and we got real nice
19 new sign put up, and, you know, those kind of things; the
20 water cooler that we needed.

21 Q Did you complete those projects yourself or did
22 station personnel assist you in completing those tasks?

23 A I'm not very well at that kind of stuff, so we
24 hired, you know, take a bid, and would have somebody come in
25 and do it, painted the building; a company out of the town

1 about 10 miles away, they put the water cooler in, and we
2 would have a plumber come in and work on the pipes.

3 JUDGE STEINBERG: Did you trade out for that
4 stuff, stuff like that?

5 THE WITNESS: I don't believe so. No, for the --
6 no, we didn't, no.

7 BY MR. MASTANDO:

8 Q Mr. Leatherman, I am asking you to take a look at
9 Mass Media Bureau No. 8.

10 A Okay. Yes, sir.

11 Q Please take a look at page 1. Would you describe
12 to me the document that you see before you?

13 A April 9, '93, I got a fax from Mike Rice, and
14 asking if we "find the name of the contact person who makes
15 the rustic looking outdoor signs," and he would like to get
16 a better looking one. Our was getting kind of dilapidated
17 in front of the radio station, and he said he thinks
18 somebody could trade it possibly with a signmaker which I
19 can't recall if I traded or paid for it, or half cash, half
20 traded. You know, I can't recall that.

21 So I got some information on it, and before I
22 received this fax we -- what prompted this was we -- our
23 Chamber of Commerce has products and services show, and it's
24 a huge auditorium and everybody displays their ware or booth
25 and everything. And one of them was a signmaker Casey Van

1 Allen went to because he comes down to the lake on weekends,
2 and went through the show and saw that sign, a rustic sign.
3 He does a very good job. And that's what prompted this.

4 I'm assuming he talked to Mike Rice, and Mike
5 asked him about this rustic sign. So I called Sign Decor
6 cause that was the place that had the booth at the products
7 and services show, and talked to Richard Rose, and his wife,
8 Rita, and got a quote on how much it would cost.

9 JUDGE STEINBERG: Is the handwriting --

10 THE WITNESS: That's my scribbling.

11 JUDGE STEINBERG: Okay, below where it says "Mike
12 Rice"?

13 THE WITNESS: Um-huh. Yeah.

14 JUDGE STEINBERG: That's all your scribbling?

15 THE WITNESS: That was me scribbling while I was
16 talking to him on the phone.

17 JUDGE STEINBERG: Okay.

18 THE WITNESS: You know, kind of a design when I
19 was talking to him, what I would like it to look, and it
20 looks just like that except the sails are better.

21 JUDGE STEINBERG: Are those the sails, like
22 sailboats?

23 THE WITNESS: Sailboat sales because we are on the
24 lake.

25 JUDGE STEINBERG: Okay.

1 BY MR. MASTANDO:

2 Q Would you please look at page 5 of that exhibit,
3 Exhibit No. 8.

4 A Page 5. Okay.

5 Q Is that also the same process of getting a rustic
6 looking sign?

7 A I believe so.

8 Q So you are in contact with Michael Rice on a
9 number of occasions.

10 MR. GAFFNEY: Objection, Your Honor.

11 JUDGE STEINBERG: Sustained. A number of
12 occasions, that's what he is objecting to. We have two
13 occasions.

14 MR. MASTANDO: Yes, Your Honor.

15 BY MR. MASTANDO:

16 Q You were --

17 JUDGE STEINBERG: You might lay a foundation. You
18 might say were these the only two conversations or contacts
19 you had, and then you might have a basis for saying a number
20 of, although two is a number.

21 BY MR. MASTANDO:

22 Q Going back to page 1, you received this fax from
23 Mike Rice, and did you have any further discussions with
24 Mike Rice with regard to this?

25 Were there any telephonic conversations?

1 A No. I sent the bill to Janet Cox.

2 Q The first sentence, the first part of the text of
3 the fax says, "Did you find out the name and contact the
4 person who makes the rustic looking outdoor signs?"

5 Was there a previous conversation that that
6 referred to?

7 A No, that's when I just assumed -- when I got this
8 I just assumed he must have talked to Casey Van Allen. And
9 then when -- whenever -- I always called back the home
10 office, I always talked to Janet.

11 Q All right.

12 A And hopefully they talked, so that Janet knew what
13 I was talking to her about. She always did.

14 Q Page No. 5 of Exhibit No. 8.

15 A Yes, sir.

16 Q "Do you have the phone number for Rinnie Sign
17 Company?"

18 I assume DL stands for your initials?

19 A Uh-huh.

20 JUDGE STEINBERG: Okay, that's a yes "uh-huh"?

21 THE WITNESS: Yes. I'm sorry.

22 BY MR. MASTANDO:

23 Q Now, were there any conversations that stood the
24 predicate for this fax?

25 A I really -- I can't remember. I don't know what

1 prompted that other than the sign.

2 Q So there was some discussion between April 9th and
3 March 17th about -- excuse me -- May 17th, about signs?

4 MR. GAFFNEY: Objection, Your Honor.

5 JUDGE STEINBERG: I think what we are getting at
6 is we have two faxes, both referring to signs, and let me
7 ask the witness.

8 Do these two faxes concern the same sign?

9 THE WITNESS: I really can't remember. Usually
10 when something like this happens is when I fax Mike back or
11 Janet back a note, I'll come in my office on a Monday, and a
12 lot of times they will do work, equipment work on weekends,
13 and at night and stuff, because there is nobody around, and
14 they are out of peoples way. And I will have a stickie note
15 on my desk and it just says, "What's the name of the sign
16 company," blah-blah-blah, "Mike."

17 And then I will just find out and fax it to him.
18 That's what I am guessing happened here.

19 JUDGE STEINBERG: I mean, my question was if you
20 were happy with Sign Decor and Mr. Rose, why did you contact
21 Rinnie?

22 THE WITNESS: All I can think of is possibly this
23 was an outdoor sign company.

24 JUDGE STEINBERG: You mean Rinnie was?

25 THE WITNESS: Yeah. But I really can't -- we

1 never did any advertising with Rinnie, I don't believe, so I
2 don't know, and I didn't have them build the sign. I'm
3 sorry, I --

4 JUDGE STEINBERG: No, you remember what you
5 remember.

6 BY MR. MASTANDO:

7 Q I would ask you to take a look now at page 2 of
8 Mass Media Bureau No. 8.

9 A Yes, sir.

10 Q Can you describe to me this particular fax
11 transmittal sheet

12 A It was regarding that storage building, and I got
13 them a couple of people for quotes, and neither one of them
14 gave me any quotes, and I got some information on things we
15 needed. And later we nixed it because Janet said, "Forget
16 it. We've got other things. We need to prioritize our
17 money. We don't need this."

18 This was mainly instigated by Casey Van Allen and
19 Dennis Klautzer.

20 Q The last line of text before "Thanks" and your
21 signing off says that "These are the questions the
22 contractors are asking me. Let me know when you have a
23 chance."

24 Did he ever let you know?

25 A No, he did not.

1 Q Did you have many discussions with Michael Rice
2 about the building of this storage building or how many -- I
3 withdraw the question.

4 How many conversations did you have with Michael
5 Rice in regard to the construction of the storage building?

6 A This one.

7 Q Just this.

8 Mr. Leatherman, I now direct you to page 4 of Mass
9 Media Bureau No. 8.

10 A Yes, sir.

11 Q Would you review this and describe to me what the
12 background of this is?

13 A As I mentioned, a lot of times I would come in
14 after a weekend, on a Monday morning, I will have little
15 note on my desk, and let's see, he wanted to know about the
16 newsroom phone. Apparently it wasn't working. And Towner,
17 where we got our -- Towner Communications out of, I believe
18 it's Columbia, Missouri, we got our phones. I took care of
19 that item, and it worked fine.

20 And Sign Decor, that's that sign thing again, and
21 we're looking for a quote or whatever here. And number
22 three was getting a quote on a water -- let's see -- water
23 pressure wash, the condenser units that hold the AC in the
24 transmitter building, and I mentioned I will fax Janet the
25 cost as soon as I can get an amount. And then have Prime

1 Construction start contract work in our shower in our
2 building.

3 The building was formerly a doctor's office, and
4 there was just wasted space. We were just piling things up
5 in there, so we had the shower taken out. Paul Hoffmeyer is
6 a good contractor, and he took that out and built shelves
7 and built an actual storage room.

8 Q Who paid for the construction projects?

9 A I am assuming the company.

10 Q You don't know that?

11 A No, I don't handle the checkbook.

12 Q Who authorized such construction projects?

13 A Janet Cox.

14 Q Then why is this fax directed to Michael Rice?

15 A Cause he gave me a note.

16 JUDGE STEINBERG: What did the note say, if you
17 can recall, or if you can paraphrase it?

18 THE WITNESS: Usually it just chicken scratching.
19 "Dan, take a look at this," and that was taped on my desk.

20 BY MR. MASTANDO:

21 Q How often did you get these notes?

22 A Not very often. Whenever, I guess whenever he
23 felt that was needed something to do about stuff like this.

24 Q How often did Michael Rice visit the stations, the
25 station?

1 A Once every other month, depending on the project.
2 You know, he was there a couple weekends in a row when the
3 production room -- a second production room being built.

4 Q When he came in for things like that, did he
5 generally leave little notes behind?

6 A Not generally.

7 Q Can you tell me why he was there? Why he would
8 come to KBMX if you were in charge?

9 A Work on equipment, technical equipment.

10 Q Did you take care of all these projects that
11 Michael Rice left for you?

12 A Yes, I did.

13 Q Did you task any of the separate items to your
14 staff to find out?

15 A I don't believe so, no.

16 JUDGE STEINBERG: What was the size of the staff
17 when you worked there?

18 THE WITNESS: We had two on-air people at one
19 time, and then three, then we moved to three on-air people.
20 And I tried to keep the people -- but myself and three other
21 sales staff, and then two front office people.

22 JUDGE STEINBERG: So basically if you didn't do
23 these things, they didn't get done?

24 THE WITNESS: Correct.

25 JUDGE STEINBERG: By "these things," I am talking

1 about what's contained in Bureau Exhibit 8.

2 THE WITNESS: Right.

3 BY MR. MASTANDO:

4 Q I would like to direct your attention to page 3 of
5 Bureau Exhibit No. 8.

6 A Yes, sir.

7 Q Can you describe to me what brought about this fax
8 from Contemporary Media Broadcasting Group?

9 A Well, I can give you my opinion. I don't know if
10 that's what you would want. But I suppose he was down
11 working on something and got awfully thirsty one time, and
12 we didn't have a water cooler. So he thought we needed a
13 water cooler.

14 JUDGE STEINBERG: He thought?

15 THE WITNESS: Yeah, he thought we needed a water
16 cooler. So we got a water cooker.

17 JUDGE STEINBERG: What's a B-O-G, bog bos, B-O-G
18 B-O-S?

19 THE WITNESS: That's the name brand of those.
20 It's the ones -- they plug in, they are electric, and they
21 are silver, and they took on the cool --

22 JUDGE STEINBERG: So that's the brand name?

23 THE WITNESS: Yeah. Yes.

24 BY MR. MASTANDO:

25 Q Is the handwriting on the bottom yours or is it

1 Mike's?

2 A That's mine.

3 Q Can you tell me about what?

4 A After I called this Hub City guy, I wanted to find
5 out when we could expect this thing so I could be there.

6 Q So if you are in charge of the station, you have
7 Michael Rice deciding to get a water cooler here, and
8 telling you to get a plumber to hook it up, do you think
9 that's a little strange that he would get into minutia of
10 your station?

11 A No.

12 Q Why is that?

13 A Well, honestly, my opinion, I don't -- those are
14 things I really didn't enjoy messing with, and he did. I
15 have sales and a business to run.

16 They still wouldn't have a water cooler if it was
17 up to me.

18 JUDGE STEINBERG: Does KCHI in Chillicothe have a
19 water cooler?

20 THE WITNESS: No, they don't. No.

21 JUDGE STEINBERG: Okay. Well, you ought to look
22 into it.

23 THE WITNESS: Yes, I will.

24 JUDGE STEINBERG: It's really nice.

25 THE WITNESS: We have got a refrigerator.

1 JUDGE STEINBERG: Okay.

2 BY MR. MASTANDO:

3 Q Did Michael Rice ever become involved in adding to
4 the libraries of KBMX?

5 A I don't know. Maybe he did before I was around.
6 I don't know about that. But not that I am aware of.

7 Q Did you have an employee there by the name of
8 Jeff?

9 A Jeff Carr was our program director.

10 Q Jeff Car was your program director.

11 Do you know if Jeff Carr had any contact with
12 Michael Rice?

13 A I know for a fact he did not.

14 Q Okay, and how do you know that?

15 A That was something that was just not done. I
16 would have heard about it, believe me.

17 Q Okay. Do you use sound effects such as for your
18 morning program?

19 A We use sound effects for commercials.

20 Q Commercials.

21 Do you maintain a library of sound effects?

22 A Yes, we do.

23 Q Do you periodically supplement that library?

24 A Yes, we do.

25 Q How do you do that?

1 A We have a service with a particular library. I'm
2 not sure what the name of it is here. They send us a new CD
3 every month. And if we want it, we keep it, and end up
4 getting billed for it. If we don't want it, we send it back
5 to them.

6 Q I would ask you if you recognize this?

7 A Yes, I do.

8 Q Can you tell me who the Jeff might be that's --

9 A That's Jeff Carr, the program director.

10 Q And also on the two, you're listed there.

11 A Um-hmm.

12 Q Dan L.

13 And the from line is Michael Rice.

14 A That's right.

15 Q I apologize for the missing pieces of the text
16 here, but this is the best copy we have.

17 Could you review the copy and describe to me
18 what's involved here?

19 A "Casey," being Casey Van Allen, "said that we need
20 some sound effect," something or other "at KBMX," something
21 "me know if we have any now and" something "them. Thanks.
22 Mike Rice."

23 Q Okay, can you identify whose handwriting is at the
24 bottom?

25 A That's all my gibberish again.

1 Q That's all your gibberish.

2 Q You said that Jeff did not have any communications
3 or contact with Mike Rice.

4 A Correct.

5 Q Yet he is in the -- he is an addressee in this
6 fax.

7 A That is correct.

8 Q Now, you mentioned that Michael Rice was not
9 involved in programming, yet here Michael Rice is involved
10 in the procurement of sound effects with KBMX.

11 A No, he is not.

12 Q Then how do you interpret the fact that Casey said
13 we need some sound effects, and it's Michael Rice's
14 signature or his name is typed at the bottom? How would you
15 describe that if he's not attempting to assist the
16 procurement of sound effects for the station?

17 A I called to find out what -- how our situation was
18 on getting music for backup commercials, and called Janet
19 back and told her that we don't need any.

20 Again, this was Casey Van Allen trying to be
21 helpful. Sometimes he is not, but trying to be helpful.

22 JUDGE STEINBERG: Okay, let me just see if I
23 understand this.

24 We have a fax from Mike Rice to you, and to Jeff
25 Carr; is that correct?

1 THE WITNESS: Yes.

2 JUDGE STEINBERG: And the fax said apparently
3 Casey told Mike Rice that we need sound effects?

4 THE WITNESS: Yes.

5 JUDGE STEINBERG: So Mike Rice is asking you about
6 the sound effects?

7 THE WITNESS: Yes.

8 JUDGE STEINBERG: And then you wrote the
9 information, all this handwritten stuff, this is what we
10 have. We have --

11 THE WITNESS: Right.

12 JUDGE STEINBERG: -- sound effects, Volume 1, 3,
13 6, plus major records, Volumes blah-blah-blah, et cetera.

14 THE WITNESS: Right.

15 JUDGE STEINBERG: And who did you transmit that
16 information to?

17 THE WITNESS: Janet.

18 JUDGE STEINBERG: Janet.

19 Why did you transmit it to Janet if she is not
20 asking you?

21 THE WITNESS: Cause I always talk to Janet.

22 JUDGE STEINBERG: And never to Mike Rice?

23 THE WITNESS: No. Whenever I called there it's
24 always to Janet.

25 JUDGE STEINBERG: Okay, so --

1 THE WITNESS: I'm insisting on what we agreed on
2 when I was first hired.

3 JUDGE STEINBERG: Okay. Did you ever tell Janet
4 "I'm not supposed to report to Mike Rice, so why is Mike
5 Rice sending me faxes and asking me to do things?"

6 THE WITNESS: No, we talked about that. Mike
7 didn't -- this was very, very infrequent. Where we had the
8 problem was with Casey Van Allen, Ken Kuenzie at the start
9 of my general manager position there. And when they would
10 come in and say, "Dan, you need to do this, or you need to
11 do that." And I said, "Baloney," and that's when I talked
12 to Janet.

13 In fact, one time I mentioned it to Mike, and he
14 said, "Tell Janet." So I can't control whether they talk
15 to me, but I can control who I talk to, and so that's when I
16 talked to Janet.

17 And like I said, she always knew what I was
18 talking about, so they must have talked about what was going
19 on, Mike and Janet.

20 JUDGE STEINBERG: Okay, so you -- let me just --
21 you responded to this by talking to Janet Cox?

22 THE WITNESS: Yes, I did.

23 JUDGE STEINBERG: And in your own mind did you
24 believe that Janet Cox would transmit the information to
25 Mike Rice?

1 THE WITNESS: I don't know.

2 JUDGE STEINBERG: Is that what you thought would
3 happen?

4 THE WITNESS: I don't know. I just assumed she
5 made the decision because she would call me back and say,
6 "Well, baloney, we don't need any more music," and I would
7 say, "You are right. We don't."

8 JUDGE STEINBERG: Well, did she in this instance,
9 if you recall?

10 THE WITNESS: I don't think we got anymore because
11 we had enough.

12 BY MR. MASTANDO:

13 Q So the owner of this station, one of the owners,
14 Mike Rice, sent you a fax, and you didn't think it was worth
15 replying to?

16 A I replied to the person who I needed to reply to.

17 Q So you said nothing to Michael Rice about this?

18 A No.

19 JUDGE STEINBERG: Why did you say something to
20 Mike -- why did you not say something to Michael Rice about
21 this, about the sound effects, when if you look at Bureau
22 Exhibit 8, which is still in front of you, page 2 is a fax
23 from Dan Leatherman to Mike Rice, page 4 is a fax from Dan
24 Leatherman to Mike Rice, page 5 is a fax from Dan Leatherman
25 to Mike Rice?

1 So some things you responded to him.

2 THE WITNESS: That's what I thought it was kind of
3 silly, cause we just --

4 JUDGE STEINBERG: Well, you didn't let me finish
5 my question.

6 THE WITNESS: Oh.

7 JUDGE STEINBERG: So you responded directly to
8 Mike Rice with respect to some things, but not all things;
9 is that a fair statement?

10 THE WITNESS: I think that would be fair.

11 JUDGE STEINBERG: Okay.

12 BY MR. MASTANDO:

13 Q And the reason you thought that this was silly,
14 and you didn't need to speak to Michael Rice was because
15 why?

16 A Because I -- I think we already had a sufficient
17 amount of music.

18 Q Do you have any reason to believe that Janet Cox
19 discussed this issue with Michael Rice?

20 A I would assume so.

21 I don't know if it answers your question or not.

22 Q What is the basis of that assumption?

23 A Because she already had knowledge on it, and had a
24 very strong opinion on what we needed to do.

25 Q And how do you know this?

1 A Because she said, "That's baloney. We don't need
2 it anyhow." I said, "I agree."

3 Q So when you called and spoke to Janet about the
4 sound effects at KBMX, it sounded as if she already knew
5 what the situation was, or did she not?

6 A It sounded as if she already knew the situation.

7 Q And do you know how she might have come about --
8 how she might have received that information?

9 MR. GAFFNEY: Objection, Your Honor. I think he
10 has answered this now a couple of times.

11 JUDGE STEINBERG: Okay, repeat the question.

12 BY MR. MASTANDO:

13 Q What basis did you have for -- how did you know
14 that Janet Cox was informed about the situation? What led
15 you to that?

16 JUDGE STEINBERG: Well, I think he said he didn't,
17 I think you asked him was his assumption that she would talk
18 to Rice about it and the witness said yeah. And then you
19 said what's the basis.

20 Did you answer that part?

21 THE WITNESS: I said I assume because she already
22 had an opinion on it.

23 JUDGE STEINBERG: I think that's as far as you can
24 take it. So I guess the objection is sort of sustained.

25 MR. GAFFNEY: So thank you, Your Honor.

1 BY MR. MASTANDO:

2 Q So did Michael Rice talk to any of your other
3 employees outside of Jeff Carr or Casey that you know of?

4 A Casey Van Allen is not an employee.

5 Q Okay.

6 A Not that I know of. Just, you know, I said it was
7 not a topic of.

8 MR. MASTANDO: No further questions, Your Honor.

9 MR. GAFFNEY: Very brief redirect, Your Honor.

10 JUDGE STEINBERG: Okay. Now, I have some
11 questions too.

12 MR. GAFFNEY: Yes, sir.

13 JUDGE STEINBERG: So maybe you ought to wait and
14 then you can --

15 MR. GAFFNEY: Certainly, Your Honor.

16 JUDGE STEINBERG: -- mop up at one time.

17 Before we start that, did you want to do anything
18 with --

19 MR. MASTANDO: Oh, as an exhibit?

20 JUDGE STEINBERG: Yes.

21 MR. MASTANDO: Yes, Your Honor.

22 Your Honor, at this time the Mass Media Bureau
23 request that we mark this Contemporary Media Broadcasting
24 Group fax sheet as Mass Media Bureau Exhibit No. 11.

25 JUDGE STEINBERG: Okay, the November 2, '93 one-